

Environmental, Social and Governance Report

2017 環境、社會及管治報告



中國稀土控股有限公司
China Rare Earth Holdings Limited

(Incorporated in the Cayman Islands with limited liability)

(於開曼群島註冊成立之有限公司)

Stock code 股份代號：00769

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1. 範圍

中國稀土控股有限公司（「本公司」）及其附屬公司（統稱為「本集團」）為中國最大規模的稀土及耐火材料生產商之一。本集團於一九九九年十月十五日在香港聯合交易所有限公司上市，是中國首間在海外上市的私有稀土和耐火材料生產企業。本集團的總辦事處及主要營業地點位於中國江蘇省宜興市丁蜀鎮，而本集團的香港營業地點則位於中環雪廠街16號西洋會所大廈15樓。

本集團致力實現業務的長遠可持續發展，於維護持份者利益之同時，亦關注環境、社會及管治的事宜。

本報告的內容乃按照香港聯合交易所有限公司上市規則附錄二十七所載之環境、社會及管治報告指引而編製，報告期為二零一七年一月一日至二零一七年十二月三十一日，內容主要包含了本集團旗下四間附屬公司在報告期內於環境及社會責任方面的實踐：

- 宜興新威利成稀土有限公司，主要從事製造及銷售稀土氧化物；
- 宜興新威利成耐火材料有限公司，主要從事製造及銷售耐火產品；
- 宜興銀茂熒光材料有限公司，主要從事製造及銷售熒光產品；及
- 無錫新威高溫陶瓷有限公司，主要從事製造及銷售高溫陶瓷產品。

1. SCOPE

China Rare Earth Holdings Limited (the "Company") and its subsidiaries (collectively referred to as the "Group") is one of the largest producers of rare earth and refractory materials in China. The Group was listed on The Stock Exchange of Hong Kong Limited on 15 October 1999 and is the first private rare earth and refractory materials producer in China that is listed overseas. The Group's main office and its main business location is at Dingshu Town, Yixing City, Jiangsu Province, and the Group's Hong Kong business location is at 15/F, Club Lusitano, 16 Ice House Street, Central.

The Group is committed to achieving long-term and sustainable business development. In addition to safeguarding the interests of stakeholders, the Group also pays attention to environmental, social and governance (ESG) issues.

The content of this Report is prepared in compliance with the Environmental, Social and Governance Reporting Guide set out in the Appendix 27 to the Rules Governing the Listing of Securities on The Stock Exchange of Hong Kong Limited. The reporting period of this report is from 1 January 2017 to 31 December 2017, and has mainly consisted of practices of the Group's four subsidiaries in respect of environmental and social responsibilities during the reporting period:

- Yixing Xinwei Leeshing Rare Earth Company Limited, mainly engaged in manufacturing and sales of rare earth oxide products;
- Yixing Xinwei Leeshing Refractory Materials Company Limited, mainly engaged in manufacturing and sales of refractory products;
- Yixing Silver Mile Fluorescent Materials Co., Ltd., mainly engaged in manufacturing and sales of fluorescent products; and
- Wuxi Xinwei High Temperature Ceramics Co., Ltd., mainly engaged in manufacturing and sales of high temperature ceramics products.

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2. 與持份者溝通

本集團意識到必須與持份者，包括客戶、供應商、分銷商及投資者等緊密溝通，瞭解其對本集團履行企業及社會責任的期望，從而籌劃發展策略，達至業務可持續發展的目標。本集團的高級管理人員被指派不時與各持份者進行探訪會議及電話會議，並通過電郵、公司郵箱及顧客服務熱線，以讓各持份者瞭解本集團之最新發展狀況；客戶服務專員亦持續與各持份者接觸，聆聽他們的意見及需求。

本公司的整體業績表現，將安排在每年的中期報告及年報中向各股東匯報。本公司亦通過舉辦股東大會，為股東及董事會提供溝通之機會。董事會主席以及審核委員會、薪酬委員會及提名委員會之主席或其委任之代表，將在股東週年大會上回答股東的提問。為更進一步促進與各持份者的有效溝通，本公司設有官方網站www.creh.com.hk，用於廣泛刊載本集團業務發展及營運最新訊息、財務訊息及其他訊息。

2. COMMUNICATION WITH STAKEHOLDERS

The Group has realised that it's necessary to maintain close communication with stakeholders including customers, suppliers, distributors and investors, and learn about their expectations on the Group's fulfillment of corporate and social responsibilities. This will facilitate the formulation of our business strategy, and help us achieve sustainable business development. The Group appoints senior management members from time to time to conduct interviews and conference calls with the stakeholders. The Group's updates are communicated to the stakeholders through e-mail, corporate mail and customer service hotline. The customer service specialist is also in constant contact with the stakeholders to listen to their views and needs.

The overall performance of the Company is reported to the shareholders in the interim report and annual report on a yearly basis. The Company also provides opportunities for shareholders and the Board of Directors to communicate through general meetings. The Chairman of the Board of Directors and the Chairmen of the Audit Committee, the Remuneration Committee and the Nomination Committee or their designated representatives answer shareholders' questions at annual general meetings. To further facilitate effective communication with the stakeholders, the Company has an official website at www.creh.com.hk for the extensive publication of the Group's business development and operation news, financial information and other information.

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3. 環境、社會及管治表現

3.1 環境

3.1.1 排放物

解決氣候變化問題，遏制全球氣溫上升是全球的重要議題。本集團意識到自身在日常運作中所產生的溫室氣體、廢水、固體廢棄物及其他污染物會對環境造成破壞。為了保護地球免受進一步的傷害，本集團已制定了一系列的環保政策，並採取不同層級的應對措施。

1. 能源節約

本集團專注提升能源效益，推動節能減排改造，例如為空調於夏季時及其他用電設備於閒置時的開關提供清晰的使用指引、在車間遙控室的空調系統開啟了時間區域設置、於更換照明系統時採用能源效益表現較佳的LED燈具、對於已被國家列為高能耗的設備與電機，如Y系列的，逐步淘汰更換等。

2. 減少廢棄物

本集團更推動電力和天然氣等低碳優質能源的使用，例如以天然氣鍋爐取代傳統燃煤鍋爐，減少硫化物、氮氧化物的排放。本集團亦盡可能對日常生產所需的資源實施循環再用，例如辦公用品等耗材均盡量選擇使用可再次充裝的，而對於無法循環再用的物資，如包裝塑膠袋、工業保鮮膜、原料內包裝袋等，我們會進行分類收集、存放，再交由具有相關資質的單位進行處理。

3. ENVIRONMENTAL, SOCIAL AND GOVERNANCE PERFORMANCE

3.1 Environmental

3.1.1 Emissions

Dealing with climate change and stemming global warming is an important issue for the entire world. The Group realised that the greenhouse gases, sewage, solid wastes and other pollutants generated in its daily operation cause damage to the environment. In order to protect the planet from further damage, the Group has developed a series of environmental policies, and taken an array of measures.

1. Energy Conservation

The Group has focused on boosting energy efficiency, and made efforts in energy conservation and emission reduction, which included providing clear guides for the switching-on and switching-off of air conditioners in summer and other equipment that are not in use, turning on time zone setting for air conditioning system in the workshops' control rooms, replacing the lighting system with LED lights that are more energy efficient, and gradually replacing and retiring equipment and motors that are classified as high energy-consumption equipment (Such as the Y series) under relevant country rules.

2. Waste Reduction

The Group has promoted the use of low-carbon and high-quality energy. For instance, the Group has replaced the traditional coal-fired boilers with natural gas boilers to reduce the emission of sulfide and nitrogen oxide. The Group also recycles the resources used in the daily production, for example, office supplies with refills are selected whenever possible. Non-recyclable resources, such as packaging plastic bags, industrial plastic wraps and raw material packaging bags, are collected and stored by category before they are disposed by qualified agencies.

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3. 減少廢水

本集團不斷探索優化生產用水給水方式，添置環保設備，以回收可再次利用的廢水及雨水，並通過在生產過程中實行串聯用水、梯級用水，以減少生產過程中廢水的產生量。

4. 商務出行節約

本集團推動商務出行的節約管理，主張以電話會議或採用電子郵件取代不必要的出行活動，有實質需要的出行盡量使用公共交通工具，從而減少因交通運輸所產生的廢氣及溫室氣體排放。

5. 向本地供應商採購

本集團會以原料質量、運輸成本、環境影響等因素作為選定供應商時的重要考慮。在符合生產條件下，本集團會優先採用本地及距離較近的供應商，並且會選取最合適運輸方式運送貨品。

6. 教育持份者

本集團會在供應鏈中宣傳環境保護的重要性，要求所有供應商必須遵守相關環境法律，按法定環境標準行事，將其作業對環境的污染減至最小，並在環境保護方面持續改善，建立及遵行合理的環境管理體系。同時，本集團亦將環境保護的概念納入職工的教育培訓綱要中，務求將環境保護訊息推廣至供應商、訪客、銷售客戶等。

7. 室內空氣質素

本集團在辦公室室內及生產車間實施全面禁煙政策，僅劃分部份室外特定區域作為吸煙區。廠區內禁止存放可能散發粉塵、惡臭氣體的物質，並禁止焚燒物品。為保持室內空氣質量達標，我們盡可能開窗通風，或使用壁扇以加強車間內的空氣流動，同時亦使用吸附塔吸收生產車間內的異味氣體。

3. Sewage Reduction

Methods are being explored by the Group to optimise the water use and supply in the production process; environmental friendly equipment has been added to recycle reusable sewage and rainwater; series water use and progressive water use methods are adopted to reduce the generation of sewage from the production process.

4. Business Trip Reduction

The Group is reducing business trips as much as possible. It encouraged employees to avoid unnecessary trips by using telephone conferences and e-mail communications. If a business trip is necessary, public transportation should be used as much as possible to reduce the waste gas and greenhouse gas emissions generated by transportation.

5. Sourcing from Local Suppliers

The Group will take raw material quality, transportation cost, environmental impact and other factors into consideration when selecting suppliers. On the premise of fulfilling production standards, the Group prefers local and nearest suppliers and selects the most appropriate transportation tools to ship goods.

6. Stakeholder Education

The Group actively promotes the importance of environmental protection in supply chain, and requires all suppliers to comply with related law, operate in accordance with statutory standards for environmental protection, minimise environmental pollution caused by their work, continuously improve their efforts in environmental protection, and establish as well as implement a sound environmental management system. The Group also incorporates the concept of environmental protection into education and training of its employees, and promotes environmental protection information among suppliers, visitors and sales customers.

7. Indoor Air Quality

The Group has implemented a non-smoking policy in office area and production workshops, and some of the outdoor areas are specified as smoking areas. Substances that may emit dust and malodorous gas are not allowed to be stored in the plant. Incineration is prohibited as well. In order to maintain indoor air quality, we ventilate as much as possible by keeping the windows open, or using wall fans to facilitate the airflow in the workshops. At the same time adsorption tower is utilised to absorb the odor in the workshops.

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於報告期內，本集團沒有任何違反環境法律法規的個案發生，而報告期內本集團所產生的廢氣及廢棄物排放量分列如下：

During the reporting period, the Group did not have any violations against the environmental laws and regulations. The emissions of waste gas and waste generated by the Group during the reporting period are as follows:

	單位 Unit	數量 Quantity	
		二零一七年 2017	二零一六年 2016
廢氣種類			
Types of waste gas			
氧化氮(NOx) (由氣體燃料消耗而產生)	公斤	412.82	415.97
Nitrogen oxides (NOx) (produced by the consumption of gaseous fuel)	kg		
氧化硫(SOx) (由氣體燃料消耗而產生)	公斤	2.05	2.07
Sulfur oxides (SOx) (produced by the consumption of gaseous fuel)	kg		
氧化氮(NOx) (由汽車使用而產生)	公斤	967.48	486.65
Nitrogen oxides (NOx) (produced by the use of vehicles)	kg		
氧化硫(SOx) (由汽車使用而產生)	公斤	1.39	1.63
Sulfur oxides (SOx) (produced by the use of vehicles)	kg		
顆粒物(PM) (由汽車使用而產生)	公斤	72.08	44.19
Particulate matter (PM) (produced by the use of vehicles)	kg		
溫室氣體 (包括範圍1及範圍2)	公噸二氧化碳當量	18,377.20	21,959.44
Greenhouse gases (Including scope 1 and scope 2)	tonnes carbon dioxide equivalent		
廢棄物種類			
Types of waste			
有害廢棄物 (中和渣及酸溶渣)	公噸	0	221
Hazardous waste (neutralized slags and acid residues)	mt		
有害廢棄物 (原料內包裝袋)	公噸	0.95	2.29
Hazardous waste (raw material packages)	mt		
有害廢棄物 (廢坩堝及地面水沖洗廢物)	公噸	3.05	6.27
Hazardous waste (waste water produced from washing crucibles and floors)	mt		
有害廢棄物 (活性碳)	公噸	0.12	0.14
Hazardous waste (activated carbon)	mt		
無害廢棄物	公噸	30.12	87.72
Non-hazardous waste	mt		

備註：二零一六年度由氣體燃料消耗而產生的廢氣及有害廢棄物(活性碳)排放量已經修正。

Note: The emissions of waste gas produced by the consumption of gaseous fuel and hazardous waste (activated carbon) for 2016 were amended.

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3.1.2 資源使用

本集團深諳地球上的資源有限，於其生產活動奉行節約用電、用水、用紙等資源的重要原則。

1. 綠色辦公室

本集團落實多方面節約用電措施，於制訂設備使用指引的同時，不斷探討能有效提升資源使用效率的措施。本集團亦強調正確使用生產設備，加強設備的維修、保養和操作，務求發揮其最佳運行效率。生產過程中每個環節均實行質檢，以減少廢品率。同時，我們亦節約使用辦公用品，文件的審閱盡量以電子文檔為主，從而減少紙張、墨水匣等資源的浪費，廢棄物實行分類收集、存放，以便重用及轉交合格處理商回收。

2. 節約用水

儘管本集團的生產用水量相對較少，惟我們仍然關注水資源使用，通過在用水現場張貼節水提示，以倡導員工及訪客節約用水。對於管道及水龍頭等設施，我們會指派專人進行定期檢查，務求對設備滴水、漏水等問題能實時維修處理，做到不開無人水，杜絕跑冒滴漏現象。本集團亦探索優化生產用水給水方式，添置環保設備，處理生產廢水至達標後再循環使用。

3.1.2 Use of Resources

The Group understands that the resources on the planet are limited, and is devoted to major principles including the conservation of power, water and paper during operating activities.

1. Green Office

The Group has implemented many electricity saving measures. In addition to formulating use guides for equipment, the Group also continuously explored the measures of effectively enhancing efficiency in use of resources. The Group has emphasised on proper use of production equipment, and strengthened repairs, maintenance and operations of equipment, thereby making equipment operating at the best efficiency. Quality inspection is conducted at each step in the production process to reduce scraps. Employees are required to save office supplies, and electronic files are preferred when reviewing documents in order to reduce the waste of paper and ink resources. Wastes are collected and stored by category to facilitate reusing and recycling by qualified agencies.

2. Water Conservation

Although the Group does not use a lot of water during production, we still attach importance to efficient use of water resource. The Group posts water-saving signs near water sources to encourage employees and visitors to save water. We have designated responsible staffs who check on water facilities, such as pipes and faucets, on a regular basis in order to repair water leaks promptly. Employees are required not to keep the water running when not in use to prevent leaking and dripping. The Group also explored methods to optimise the water use and supply in the production process, and added environmental friendly equipment to treat sewage for reuse once it meets relevant standards.

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於報告期內，本集團在運作及生產期間所消耗的各種主要資源概列如下：

During the reporting period, the Group consumed the following resources in the production process:

	單位 Unit	數量 Quantity	
		二零一七年 2017	二零一六年 2016
資源 Resources			
電力 Electricity	千瓦時 kWh	13,249,061	16,235,867
天然氣 Natural gas	立方米 m ³	417,665	1,207,715
水 Water	立方米 m ³	125,683	214,168
包裝物料（紙材料） Packaging materials (paper materials)	公噸 mt	35.14	34.50
包裝物料（鐵材料） Packaging materials (iron materials)	公噸 mt	45.78	36.62
包裝物料（木材料） Packaging materials (wood materials)	公噸 mt	398.23	356.00
包裝物料（塑膠材料） Packaging materials (plastic materials)	公噸 mt	20.17	18.68

備註：二零一六年度包裝物料（鐵材料）及包裝物料（木材料）的耗用量已經修正。

Note: The consumption of packaging materials (iron materials) and packaging materials (wood materials) for 2016 was amended.

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3.1.3 環境及自然資源

本集團所選用的物資及產品的製造過程符合國家環保政策，每年均對生產區進行環保檢測，以確保沒有違規的狀況。本集團希望藉教育及宣傳加強員工之環保意識，我們每年都組織一天無紙化辦公日活動，提倡節約用紙，實現無紙化辦公。我們亦積極支持政府舉辦的綠色活動，例如配合政府植樹節活動，在廠區附近公共地段植樹，把保育自然資源的行為滲透到每位員工的日常生活中，形成愛護綠樹的習慣。

3.2 社會

3.2.1 僱傭

維繫和保持和諧的僱傭關係是公司穩定向前發展的重要基石，因此除了兼顧各附屬公司所在地的勞動法規要求，本集團亦制定了完善的薪酬體系及福利政策，保障所有員工獲得公平的對待。

1. 平等機會與多元共融

每名工作應徵者均擁有相同的應徵權利，本集團不會因性別、年齡、身體狀況及種族等因素而出現歧視的情況，提供平等的就業機會。我們亦只會參考員工的工作表現、經驗及個人能力作為員工晉升的條件，其他因素如婚姻及身體狀況等均不會影響員工的晉升機會。

3.1.3 The Environment and Natural Resources

The materials selected by the Group, as well as the manufacturing process of its products comply with the environmental protection policies in China. Environmental audits are conducted in the production area every year to ensure that there is no violation. The Group looks to strengthen the environmental protection awareness of employees through education and promotions. Paperless Office Day is organised every year to save paper and achieve paperless office. We also actively support the “green” activities held by the government, such as participating in the tree planting activities. We planted trees in the public areas near the plant, and encourages employees to protect natural resources and green plant in their daily life.

3.2 Social

3.2.1 Employment

It is an important cornerstone for the stable development of the Company to maintain harmonious employment relationships, therefore, other than complying with local labour laws and regulations, the Group has also developed sound wage systems and benefit policies to ensure all employees are treated fairly.

1. Equal Opportunities, Diversity and Inclusiveness

Each job candidate has an equal job opportunity. The Group does not engage in any discrimination based on any factor such as gender, age, physical condition or ethnicity, and strives to provide equal job opportunities. We only refer to the employees' performance, experience and competence when making promotion decisions. Other attributes such as marital status and physical condition will not affect an employee's opportunity to be promoted.

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2. 員工福利

所有員工皆與本集團簽訂僱傭合約，因此皆受到相關勞工法例的保障。本集團亦已為員工購買社會保險，使他們能以較低成本使用醫療服務。本集團為核心人員及年老員工繳納住房公積金及為女職工組織免費婦檢。當遇到與工作有關的傷亡情況，本集團定必依照勞動法對員工及家屬作出相應的合理賠償。

3. 工作生活平衡

保持工作與生活的平衡對於員工的身心健康而言絕對不容忽視，因此本集團不會強逼員工超時工作。為協助員工減輕工作壓力，本集團每年均會舉辦秋季運動會及員工交流會議等活動，讓員工在工餘時間能聚首一堂，藉此提高彼此及部門之間的溝通，凝聚員工的團隊精神，營造愉快的工作氛圍。

於報告期內，本集團並沒收到有關於歧視或招聘的投訴個案，而整體員工每月平均流失率約為0.72%。

2. Employee Benefits

An employment contract is signed between the Group and all its employees, and the employees are therefore protected by relevant labour laws and regulations. The Group also purchases social insurance for employees so that they can use medical services at a relatively low cost. The Group pays the Housing Provident Fund for key and senior employees and organises free gynecological examinations for female employees. The Group makes reasonable compensation for employees and their families for work-related injuries and death in accordance with the labour law.

3. Work and Life Balance

Maintaining a good work and life balance is essential for employees' physical and mental health, therefore, the Group never forces employees to work overtime. In order to help employees destress, Autumn Sports Games, Employee Exchange Conference and other activities are held every year, which help encourage employees to get together outside of work, improve the communication among employees and departments, build teamwork and create a pleasant work atmosphere.

During the reporting period, the Group did not receive any cases of discrimination or complaints against the recruitment practices. The overall average monthly employee turnover rate was approximately 0.72%.

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於二零一七年十二月三十一日，本集團的員工總數及分佈概述如下：

As of 31 December 2017, the total number and distribution of the employees of the Group are summarised as follows:

	員工人數	
	二零一七年 2017	二零一六年 2016
性別 Gender		
男性 Male	310	346
女性 Female	118	133
工作類別 Job category		
全職 Full-time	426	479
兼職 Part-time	2	0
年齡 Age		
18 - 30	31	43
31 - 45	163	185
46 - 60	216	244
> 60	18	7
地理區域 Geographical area		
本省 Local province	381	371
外省 Other provinces	47	108

3.2.2 健康與安全

本集團十分重視員工的職業健康與安全，因此積極採取安全隱患排查機制，以工作零事故作為目標。

1. 工作場所設備之安全管理

本集團在辦公室及廠區各車間張貼設備安全操作規程及作業指示，以協助及提醒員工瞭解各工序的安全操作要點。對於一些相對風險較高的工作崗位，本集團亦會提供各類適當的保護設備，以減少職業事故發生率及減低事故發生時對員工的傷害。

3.2.2 Health and Safety

The Group attaches great importance to the occupational health and safety of its employees. Therefore, it takes the initiative to use an investigation mechanism to identify potential safety hazards and is striving to achieve the goal of zero work-related accidents.

1. Safety Management of Equipment in the Workplace

The Group has posted equipment safety procedures and operation instructions in the office areas and the workshops to remind employees of the safety practices for each process. The Group also provides appropriate protection equipment for positions with relatively higher risks to reduce the occurrences of occupational accidents and injuries caused by accidents.

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2. 員工工作安全監控及培訓

本集團主要通過組織員工參與職業健康及安全培訓，例如組織中暑急救演練，並張貼崗位職業病危害告示，使之認識到其崗位的職業性危害。本集團亦通過內聯網每年向員工發放職業危害告知確認書，從而提升員工的安全意識。

於報告期內，本集團並未違反任何有關職業健康及安全相關的法律法規，亦未有任何員工因工作原因而發生死亡情況。報告期內員工因工傷而損失的工作日共計580天。

3.2.3 發展及培訓

本集團視員工為其寶貴資產，為提升團隊的技能及專業水準，本集團會定期為員工提供培訓及進修機會。本集團在職業發展政策方面著重關注扶助員工發揮所長，例如為新員工進行工作指導、建立培訓管理制度及培訓計劃，同時亦安排有經驗的員工，在日常工作期間對新員工進行指導，務求令各員工盡快適應本集團的文化，以推動本集團不同範疇的長期發展。

2. Employee Safety Monitoring and Training

The Group helps employees to recognise the safety hazards in their jobs mainly by organising occupational health and safety trainings (such as heatstroke emergency drills) and posting occupational hazard signs. The Group also issues Occupational Hazard Acknowledge Letter to employees through the intranet every year to improve their awareness on safety.

During the reporting period, the Group did not have any violations against any occupational health and safety laws and regulations, and there were also no work-related fatalities. There were a total of 580 work days lost due to work-related injuries among the Group during the reporting period.

3.2.3 Development and Training

The Group treasures its employees as its valuable assets. To improve team's skills and professionalism, the Group regularly provides training and education opportunities for its employees. The Group's career development policy focuses on helping employees to develop their strengths. For example, the Group provides guidance for new employees, establishes training management systems and training plans, and arranges experienced employees to guide new employees during day-to-day work in order to help employees adapt to the Group's culture and promote the Group's long-term development in different areas.

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於報告期間，本集團員工的平均培訓時數如下：

During the reporting period, the average number of training hours of the Group's employee is as follows:

	每名員工的平均培訓時數	
	Average training hours per employee	
	二零一七年 2017	二零一六年 2016
性別 Gender		
男性 Male	10.16	12.04
女性 Female	12.48	20.84
員工職系 Employment Grade		
高級管理層 Senior management	27.79	21.95
中級管理層 Middle management	29.26	22.03
初級員工 Junior employees	7.05	13.65

3.2.4 勞工準則

本集團嚴格禁止使用童工及強制性勞動，僅會聘請18歲以上的員工且不會強迫員工超時工作，從而維持一個尊重人權的工作環境。

人力資源部在招聘新員工時，會剔除不滿18歲應聘者簡歷。自製定規定以來從未有發生聘用未成年員工的事件。人力資源部亦會每月定時查看工作考勤記錄，如發現超時工作，立即進行原因調查，確保無員工在非自願的情況下超時工作。

3.2.4 Labour Standards

The Group strictly prohibits the use of child labour and forced labour. It only employs employees over the age of 18 years and never forces employees to work overtime to maintain a work environment that respects human rights.

During the recruitment process, Human Resources Department eliminates candidates who are under the age of 18 years. Since the policy was implemented, no minors have ever been employed. The Human Resources Department also reviews the attendance records on a regular basis. If overtime work is discovered, investigation will be conducted immediately to ensure that employees are not forced to work overtime.

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3.2.5 供應鏈管理

在採購過程及供應商管理方面，本集團制訂了《中國稀土供應商行為準則》，從法律、禁止貪污賄賂、員工的基本人權、健康與安全、環境保護等方面對供應商提出了具體的規範要求。除此以外，社會責任表現亦是挑選供應商的重要準則之一。本集團會要求供應商必須具有執照、環保認證、安全生產認證、職業健康認證等相關資格，以配合本集團的整體營運方針。

本集團每年均對活躍及重要供應商進行定期評估，通過問卷、電郵或會面等形式評定供應商的服務表現是否達到本集團的要求。

於報告期內，本集團活躍供應商有68個來自中國，1個來自香港。

3.2.6 產品責任

本集團十分重視其產品的質量及安全，所有產品均按合同約定及危險品相關法律及規定來訂立交貨標準，絕不提供劣質產品以維護客戶利益。所有原材料均來自合格供應商提供的優質生產材料。生產過程依照ISO9001品質管理體系方針，若出現技術方面的問題，技術部將會牽頭處理。如有需要改進產品質素的相關事項，則由技術部聯同生產部依照內部控制程式進行處理，並將產品質素改進的信息交由銷售部向顧客及時傳遞。售出的產品若出現品質問題，本集團會負責產品的回收及與客戶協商後續跟進安排。於報告期間，本集團已售或已運送的产品並未有因安全與健康理由而須作回收。

3.2.5 Supply Chain Management

In order to manage the procurement process and suppliers, the Group has developed the Code of Conduct for Rare Earth Suppliers in China, which requires suppliers to comply with its specific requirements in terms of compliance with laws, anti-corruption, employees' basic human rights, health and safety, and environmental protection. The social responsibility performance is also one of the important criteria for selecting suppliers. The Group requires suppliers to have relevant qualifications such as licenses, environmental certifications, safe production certifications and occupational health certifications to meet the Group's overall operating principles.

Every year, the Group conducts periodic assessments of active and key suppliers to assess whether the suppliers' performance meets the Group's requirements through questionnaires, e-mails or interviews.

During the reporting period, the Group has 68 active suppliers from China and 1 from Hong Kong.

3.2.6 Product Responsibility

The Group pays great attention to the quality and safety of its products. All of the product delivery standards are set up according to relevant contracts and laws and regulations regarding hazardous goods. To safeguard customers' interests, the Group never provides products with poor quality. All raw materials are of high quality and are provided by qualified suppliers. The Group's production process complies with the ISO9001 Quality Management System. If there are technical problems, the Technical Department takes the lead in addressing the problems. If it is necessary to improve product quality, the Technology Department will address the issue in accordance with the internal control procedures together with the Production Department, and will also submit the quality improvement information to the Sales Department so that the customer can be informed in a timely manner. If there are quality issues for the products sold, the Group will be responsible for recalling the products and negotiating with the customer for follow-up arrangements. During the reporting period, the products sold or shipped by the Group have not been recalled for safety and health reasons.

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為加強客戶對本集團產品的信心，本集團設立了熱線電話及現場跟蹤服務，以協助客戶解決產品品質上的問題。本集團亦設立客戶投訴熱線，以及傳真和電郵的溝通管道，在接到客戶投訴時，必須在12小時內向客戶提供滿意答覆。

在維護及保障知識產權方面，本集團亦十分重視。本集團承諾不會購買盜版產品，不會採用未經授權的圖像或設計。若產品的生產過程涉及到圖紙的版權問題，均需得到持有人授權同意後，方可使用；本集團設立自有圖片庫供員工使用，如圖片不能使用，則需通知企業管理部，進行調整修改。

本集團已制定了消費者資料保障及私隱政策，未經客戶允許絕不會將客戶資料用做宣傳用途。所有客戶資料皆按照檔案管理要求進行嚴格保管，保密級別分為普通、機密、絕密，且根據保密級別不同，保密要求亦不同。電腦系統內的資料將根據保密要求而設置相應等級的查詢密碼及授權功能。紙質材料將有專人保管，獲得授權查閱資料的人員必須進行備案登記。

To improve the customers' confidence in the Group's products, the Group has set up a special hotline and on-site tracking services to help customers solve product quality issues. The Group has also set up a customer complaint hotline, as well as communication channels through fax and e-mail. Customer complaint must be resolved within 12 hours upon the receipt of the complaint.

The Group also pays great attention to the maintenance and protection of intellectual property rights. The Group is committed not to purchase pirated products and not to use images or designs that are not authorised. If a product involves any copyright issue during the production process, it is required to obtain the consent of the owner before use. The Group has set up its own picture library for employees to use. If any picture is not usable, it is required to inform the Corporate Management Department to make adjustments.

The Group has developed a customer data protection and privacy policy. Customer's information will not be used for promotional purposes without their permission. All customer information is in strict control with the file management requirements. The requirements for confidentiality are different for information with different confidentiality levels, which are regular, confidential and top secret. Information in computer system is protected with query password and authorisation functions based on its confidentiality levels. Paper documents are managed by designated personnel and people who have been authorised to review the documents must make relevant records.

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3.2.7 反貪污

本公司的董事局成員來自各個背景，共同監管本公司的管治政策。本集團的所有員工均不得向政府官員及業務單位經辦人行賄，也杜絕一切受賄行為。本集團亦設立了員工舉報機制，為員工提供信箱、微信、電話等管道，用於反映工作上遇到的不公平問題。本集團在接到舉報後，承諾兩天內著手調查。調查結果除了匯報給本集團人事部副總裁外，亦會向舉報人公佈。所有的舉報個案均會存檔並做保密處理。

本集團對物料採購制定了《採購招標管理制度》，本集團所有採購，包括所有以合約方式有償取得物資、工程及勞務的行為、購買、租賃、委託等，必須採用公開招標形式。以投標方的資質情況、最終採購物資的質、量、價、運送時間等各方面因素作為評價及考核標準。

本集團聘請獨立審核公司對本集團帳目進行半年度及整年度審核，一方面確保本集團的賬目正確並保障股東的利益，另一方面會根據獨立審核公司出具的報告內容，改善財務內部監控制度。

3.2.8 社區投資

本集團將致力成為可持續企業，肩負改善環境、社會及管治表現之責任，積極參與及支持本地社區及政府部門組織的活動。

3.2.7 Anti-corruption

Board members of the Company are from various background, and they supervise the Company's governance policy collectively. All of the Group's employees are not allowed to bribe government officials and business managers, and they are also not allowed to take any bribery. The Group also set up a reporting mechanism for employees. The Group provides employee with reporting channels include mailboxes, WeChat and telephone to report unfair treatment encountered at work. Upon receipt of the report, the Group promises to investigate within two days. The results of the investigation will be submitted to the Group's Vice President in Human Resources Department as well as to the reporters. All reporting cases will be documented and kept confidential.

The Group has developed the Procurement and Bidding Management System for the procurement of materials. Public bidding must be performed for all of the Group's procurement activities, including all materials, projects and labour outsourced, purchased, leased and commissioned through contracts. The bidders' qualifications, the quality, quantity, price and delivery timeframe of the materials purchased at the end are used as the evaluation and assessment criteria.

The Group has hired an independent audit company to conduct semi-annual and annual audits on the Group's accounts in order to ensure that the Group's accounts are correct, the interests of the shareholders are protected, and improve the financial internal control system based on the report prepared by the independent audit company.

3.2.8 Community Investment

The Group is committed to becoming a sustainable company, and it shoulders the responsibility of improving its ESG performance. The Group has actively participated in and supported activities organised by local communities and government agencies.



中國稀土控股有限公司

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